

GIBSON DUNN

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August 5, 2021

VIA ECF & FACSIMILE

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

I respectfully and regrettably write to request a brief adjournment of Kaleil D. Isaza Tuzman's sentencing, currently scheduled for August 20, 2021 at 2:00 pm.

My client and I were prepared to proceed with his sentencing on July 30, as previously scheduled by the Court, and numerous family members and friends of Mr. Isaza Tuzman had flown in for the sentencing on that date from around the country, as well as from Israel and Colombia. When Your Honor ordered on July 29 that my client's sentencing be adjourned due to the forfeiture dispute, we immediately began to work with the government on a negotiated resolution, and we expect to submit the forfeiture order on consent for Your Honor's consideration this week.

The reason for the requested adjournment is due to a previously scheduled out-of-town vacation with my family in late August through Labor Day, including on August 20. If equally convenient for the Court, I respectfully request an adjournment of the sentencing until after Labor Day, when I return to New York City. I have hesitated to submit this request given the challenges of scheduling this sentencing, and am only doing so now after consulting with my family, as well as my client and the government, neither of whom object to this request. That said, I will adjust my vacation schedule and return to New York City if Your Honor prefers to proceed on August 20.

GIBSON DUNN

August 5, 2021

Page 2

Should Your Honor grant this adjournment request, there are a number of days in September that are Jewish holidays on which I respectfully request that the Court not schedule sentencing: September 7-8 (Rosh Hashanah), September 16 (Yom Kippur), September 21-22 (Sukkot), and September 28-29 (Shemini Atzeret and Simchat Torah).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Avi Weitzman", with a stylized, flowing script.

Avi Weitzman

cc. All Counsel of Record (via ECF)